

JUDGE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AVALON CONDOMINIUM HOMEOWNER’S
ASSOCIATION, a Washington Non-Profit
Corporation,

Plaintiff,

v.

CENTURY SURETY COMPANY, an Ohio
Corporation; and DOE INSURANCE
COMPANIES 1–10,

Defendants.

NO. 2:20-cv-01430-RSM

STIPULATED MOTION AND ORDER TO
CONTINUE DEADLINE FOR FILING
MOTIONS RELATED TO DISCOVERY AND
DEADLINE FOR DISCOVERY TO BE
COMPLETED

NOTE ON MOTION CALENDAR:
SEPTEMBER 24, 2021

I. STIPULATED MOTION

Come now, Plaintiff Avalon Condominium Homeowner’s Association (“Association”) and Defendant Century Surety Company (“Century”), by and through their respective counsel, and stipulate to this motion for a continuance of the deadlines for filing motions related to discovery and for discovery to be completed.

Counsel for the Association and Century have met and conferred and propose an extension of the following deadlines:

| | Current Deadline | Proposed Deadline |
|---|------------------|-------------------|
| Deadline for Filing Motions Related to Discovery | 10/01/2021 | 10/15/2021 |
| Discovery Completed By | 11/01/2021 | 11/15/2021 |

STIPULATED MOTION AND ORDER TO
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RELATED TO DISCOVERY AND DEADLINE FOR
DISCOVERY TO BE COMPLETED - 1

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II. GOOD CAUSE SHOWN

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the parties have agreed to enter into mediation of this matter on September 28, 2021. For purposes of judicial economy, the parties propose that the deadlines for filing motions related to discovery and for discovery each be extended two weeks to allow the parties to prepare discovery motions and take depositions after the mediation, if necessary. No previous extensions of time have been requested or granted by the Court in this matter, and this extension is not made for purposes of delay, but rather to permit the parties additional time in an attempt to resolve this matter amicably without incurring substantial further costs or requiring additional time and resources on behalf of the Court. The parties respectfully request that the Court extend the currently scheduled deadlines as set forth above. A proposed order is included herewith.

STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jessica R. Burns

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4 ***Attorneys for Defendant***

ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the deadlines for filing motions related to discovery and for discovery to be completed are extended as follows:

| | Current Deadline | Proposed Deadline |
|---|------------------|-------------------|
| Deadline for Filing Motions Related to Discovery | 10/01/2021 | 10/15/2021 |
| Discovery Completed By | 11/01/2021 | 11/15/2021 |

No other deadlines or events are altered.

DATED this 28th day of September, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jessica R. Burns

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, a copy of the foregoing ***Document*** and this ***Certificate of Service*** were served on counsel below as noted:

Attorneys for Century Surety Company:

Eliot M. Harris, WSBA No. 36590 ☐ via US Mail
Miles J. Stewart, WSBA No. 46067 ☐ via Legal Messenger
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

SIGNED this 24th day of September, 2021 at Seattle, Washington.

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